

1 HEATHER E. WILLIAMS, SBN 122664
Federal Defender
2 HOOTAN BAIGMOHAMMADI, SBN 279105
Assistant Federal Defender
3 Designated Counsel for Service
801 I Street, Third Floor
4 Sacramento, CA 95814
T: (916) 498-5700
5 F: (916) 498-5710
6 Attorneys for Defendant
MANUEL TREJO
7

8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE EASTERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,) Case No. 2:24-cr-69-TLN-1
11)
Plaintiff,) **STIPULATION AND ORDER TO CONTINUE**
12) **STATUS CONFERENCE AND EXCLUDE TIME**
vs.)
13) Date: November 21, 2024
MANUEL TREJO.) Time: 9:30 a.m.
14) Judge: Hon. Troy L. Nunley
Defendants.)
15 _____)

16 IT IS HEREBY STIPULATED and agreed by and between United States Attorney
17 Phillip A. Talbert, through Assistant United States Attorneys Emily Grace Sauvageau and
18 Matthew de Moura, counsel for Plaintiff; and Federal Defender Heather Williams, through
19 Assistant Federal Defender Hootan Baigmohammadi, counsel for Defendant Manuel Trejo that
20 the Status Conference currently set for November 21, 2024 at 9:30 be continued to February 6,
21 2025 at 9:30 a.m.

22 The parties specifically stipulate as follows:

- 23 1. By previous order, this matter was set for a Status Conference to be held on
24 November 21, 2024, at 9:30 a.m.
25 2. Mr. Trejo moves for the Status Conference to be continued to February 6, 2025 at
26 9:30 a.m.
27
28

3. To date, the government has produced 96 pages, 59 videos, and 12 audio files in discovery. It also plans to make an offer to Mr. Trejo in the next few weeks.
4. Mr. Trejo requires additional time to review the discovery; investigate and research possible defenses; research potential pretrial motions; explore potential resolutions to the case; and otherwise prepare for trial.
5. Mr. Trejo believes that failure to grant the requested continuance would deny him the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.
6. The government does not object to the continuance request.
7. For the purpose of computing time under 18 U.S.C. § 3161 *et seq.* (Speedy Trial Act), the parties request that the time period between November 21, 2024 and February 6, 2025, inclusive, be deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(B)(iv) (Local Code T4), because it would result from a continuance granted by the Court at the defense's request, based on a finding that the ends of justice served by granting the continuance outweighs the best interest of the public and in a speedy trial.

Respectfully submitted,

HEATHER E. WILLIAMS
Federal Defender

Date: November 18, 2024

/s/ Hootan Baigmohammadi
HOOTAN BAIGMOHAMMADI
Assistant Federal Defender
Attorneys for Mr. Trejo

Date: November 18, 2024

PHILLIP A. TALBERT
United States Attorney

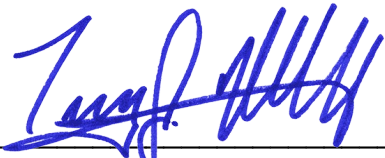
/s/ Emily G. Sauvageau
Emily G. Sauvageau
Assistant United States Attorney
Attorneys for Plaintiff

ORDER

The Court, having received and considered the parties' stipulation, and good cause appearing therefrom, adopts the parties' stipulation in its entirety as its order.

IT IS SO ORDERED.

Dated: November 18, 2024



Troy L. Nunley
Chief United States District Judge